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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 WELLS FARGO BANK, N.A., a national
banking association,

10 Plaintiff,

11 vs.

12 ALIREZA KAVEH, an individual; ALIREZA
KAVEH, as Trustee of the Alireza Kaveh
13 Family Trust; JPA INVESTMENTS, LLC, a
Nevada limited liability company, JOCELYNE
14 ABRAR, an individual; JOCELYNE ABRAR
as Trustee of The Jocelyne Abrar Trust; ALI
15 KAVEH aka Alireza Kaveh, Sr., an individual;
MOLOUK KAVEH; and MOLOUK KAVEH,
16 as Trustee of The Kaveh Family Trust,

17 Defendants.

Case No.: 2:13-CV-1472-GMN-NJK

18 **STIPULATION AND ORDER TO:**

19 **I) CORRECT CLERICAL ERROR AND AMEND JUDGMENT ENTERED**
20 **MARCH 31, 2017;**

21 **II) DISMISS SECOND AND THIRD CLAIMS FOR RELIEF**

22 Plaintiff, Wells Fargo Bank, N.A., by and through its counsel of record, Michael F.
23 Lynch, Esq., of Lynch Law Practice, PLLC, and Defendants JPA Investments, LLC; Jocelyne
24 Abrar; Jocelyne Abrar as Trustee of The Jocelyne Abrar Trust; Ali Kaveh aka Alireza Kaveh,
25 Sr.; Molouk Kaveh and Molouk Kaveh as Trustee of The Kaveh Family Trust dated July 31,
26 1998 ("The Kaveh Family Trust"), and Alireza Kaveh, in Proper Person, stipulate and agree as
27 follows.

1 **IT IS HEREBY STIPULATED AND AGREED** the Judgment entered March 31,
2 2017 (Document 108) is corrected and clarified to delete and omit any reference to
3 Defendants Alireza Kaveh, Sr. Molouk Kaveh, and Molouk Kaveh Trust and amended to state
4 that it is entered only against Defendants Alireza Kaveh, as an individual; Alireza Kaveh, as
5 Trustee of the Alireza Kaveh Family Trust; JPA Investments, L.L.C.; Jocelyne Abrar, as an
6 individual; and Jocelyne Abrar, as Trustee of the Jocelyne Abrar Trust, jointly and severally.

7 **IT IS HEREBY FURTHER STIPULATED AND AGREED** that the Second Cause
8 of Action stated in the Complaint filed August 16, 2013 arising from the Frontier Loan, Note
9 and Guaranty against Alireza Kaveh, Sr.; Molouk Kaveh and Molouk Kaveh as Trustee of
10 The Kaveh Family Trust dated July 31, 1998 ("The Kaveh Family Trust") shall be and hereby
11 is dismissed without prejudice, in its entirety, the parties to bear their own attorneys fees and
12 costs as it relates to that claim.

13 **IT IS HEREBY FURTHER STIPULATED AND AGREED** that the Third Cause
14 of Action stated in the Complaint filed August 16, 2013 arising from the Alireza Loan, Note
15 and Guaranty shall be and hereby is dismissed without prejudice, in its entirety, the parties to
16 bear their own attorneys fees and costs as it relates to that claim.

17 **IT IS HEREBY FURTHER STIPULATED AND AGREED** that this Stipulation
18 and Order shall not effect or effectuate a settlement of the First Cause of Action stated in the
19 Complaint filed August 16, 2013 arising from the Craig 95 Loan, Note and Guaranty or affect
20 the Judgment as it is entered against Defendants Alireza Kaveh, as an individual; Alireza
21 Kaveh, as Trustee of the Alireza Kaveh Family Trust; JPA Investments, L.L.C.; Jocelyne
22 Abrar, as an individual; and Jocelyne Abrar, as Trustee of the Jocelyne Abrar Trust
23 (Document 108).

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IT IS HEREBY FURTHER STIPULATED AND AGREED that Frontier Defendants waive any right under FRCP 41 or otherwise that the dismissal stated herein shall operate as an adjudication on the merits or as a bar to Plaintiff seeking relief in a newly filed action relating to the Frontier Loan or the Second Cause of Action.

SO STIPULATED

SO STIPULATED

DATED this 30th day of June, 2017.

DATED this 28th day of June, 2017.

MINCIN LAW, PLLC

LYNCH LAW PRACTICE, PLLC

By: /s/ David Mincin
David Mincin, Esq.
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JPA Investments, LLC*

By: /s/ Michael F. Lynch
Michael F. Lynch, Esq.
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Las Vegas, Nevada 89169
Attorney for Plaintiffs

IT IS SO ORDERED.

DATED this 1 day of May, 2018.

Gloria M. Navarro, Chief Judge
United States District Court

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